



Sanford Heisler Sharp, LLP
611 Commerce Street, Suite 3100
Nashville, TN 37203
Telephone: (615) 434-7000
Fax: (615) 434-7020
www.sanfordheisler.com

Michael Lockman, Associate
(615) 434-7004
mlockman@sanfordheisler.com

New York | Washington D.C. | San Francisco | Palo Alto | Baltimore | Nashville | San Diego

November 17, 2023

VIA ECF

The Honorable Lewis J. Liman
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Robinson v. De Niro and Canal Productions, Inc.*, No. 1:19-cv-09156 (LJL) (KHP)

Dear Judge Liman:

This firm represents Plaintiff Graham Chase Robinson. This letter is submitted jointly on behalf of all parties in this matter.

We write to propose for the Court's consideration a briefing schedule for post-trial motions.

The parties propose that any motions under Federal Rule of Civil Procedure 50 or 59 be filed within 28 days following entry of judgment (as required, *see* Fed. R. Civ. P. 6(b)(2)), that any opposition thereto be filed within 28 days after any such motion is filed, and that any reply be filed within 14 days thereafter.

The parties propose that any motion for attorneys' fees and/or costs be filed after any appeals and subsequent trials in this matter.

We appreciate the Court's consideration of this matter.

Respectfully submitted,

/s/
Michael Lockman